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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

IN RE:	§	CASE NO. 13-10197-RLJ-13
	§	
RAY MICHAEL NEW, SR.	§	
	§	
	§	
DEBTOR	§	CHAPTER 13

DEBTOR'S MOTION TO EXTEND THE AUTOMATIC STAY  
AND REQUEST FOR INTERIM RELIEF

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, RAY MICHAEL NEW, SR., (herein Debtor), and files this *Motion to Extend the Automatic Stay* and Request for Interim Relief, and, in support thereof, would show the Court as Follows:

1. Debtor's Chapter 13 case was filed on August 5, 2013, in the Northern District of Texas, Abilene Division.
2. Debtor filed a prior Chapter 13 bankruptcy case, Case No. 12-10010-RLJ-13, in the Northern District of Texas, Abilene Division on January 13, 2012, and the said case was dismissed without prejudice on August 29, 2012, for failure to make timely payments to the Chapter 13 Trustee.
3. As a result of the Debtor's prior bankruptcy case, Case No. 12-10010-RLJ-13, pending within one year period before Debtor's current Chapter 13 case was filed and pursuant to the provisions of 11 U.S.C. §362(c)(3)(A), the automatic stay will terminate on the 30th day after filing Debtors' current Chapter 13 case.
4. Debtor will show this court the filing of Debtor's current Chapter 13 case is filed in good faith as to the creditors stayed.
5. The Court's next regular general docket to consider such a motion is on August 26, 2013 (less than 21 days from the filing of the motion). The following general docket is scheduled for October 3, 2013 (more than 30 days after the filing of the motion).

6. Unless the Court hears the Debtor's Motion to extend the Automatic Stay on its October 3, 2013, docket, it will be necessary to schedule a "special setting" to comply with the 30 day requirement of 11U.S.C. §362(c)(3)(B). Debtor requests the court to grant the Motion to Extend the Automatic Stay on an interim basis until the Motion can be heard on the October 3, 2013, docket.
7. If the Court grants the relief requested, Debtor's counsel will mail notice of the Motion to Extend the Automatic Stay and Request for Interim Relief to all creditors.
8. After a hearing on the motion, Debtor requests this Court Enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. 1362(c)(1), 11 U.S.C. §361(c)(2), or a Motion for Relief is granted under 11 U.S.C. §362(d) and for such further relief to which Debtors may be justly entitled.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that the Court extend the automatic stay on an interim basis until hearing can be held on the Court's regular docket on October 3, 2013, and after such hearing prays the Court enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. 1362(c)(1), 11 U.S.C. §362(d)(2) or a Motion for Relief is granted under 11U.S.C. §362(d), and for such other relief at law and equity to which they may be entitled.

Respectfully submitted,  
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/s/ Monte J. White  
Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing *Motion to Extend the Automatic Stay* and *Notice of Hearing* was served on August 6, 2013, to the following parties by ECF and/or regular First Class mail:

Walter O'Cheskey  
Standing Chapter 13 Trustee  
6308 Iola  
Lubbock, Texas 79424

U.S. Trustee  
1100 Commerce Street  
Room 9C60  
Dallas, Texas 75242

Ray Michael New, Sr.  
1617 Oak St.  
Abilene, TX 79602

Also, attached Matrix

/s/Monte J. White  
Attorney for Debtor

Abilene Used Auto Sales  
497 E S 11th Street  
Abilene, TX 79602

IRS Department  
Attn: Dorothy Shields  
1100 Commerce  
Mail Code 5027  
Dallas, Texas 75242

Toledo Fin  
3105 S. 14th St.  
Abilene, TX 79605

Advance America  
3285 S. 14th  
Abilene, TX 79605

IRS Special Procedures  
Mail Code 5020-DAL  
1100 Commerce St, Room 9B8  
Dallas, TX 75242

Toledo Finance  
203 E. Baker  
Brownwood, TX 76801

Alltel Communications  
1801 B South Monroe Street  
Tallahassee, FL 32315

Lhr Inc  
56 Main St  
Hamburg, NY 14075

West Central Tx Coll B  
Po Box 2586  
Abilene, TX 79604

Bayview Loan Servicing  
4425 Ponce de Leon Blvd. 5th Fl  
Coral Gables, FL 33146

Michael Reed  
McCreary Veselka, Bragg & Allen  
PO Box 1269  
Round Rock, TX 78680

West Central Tx Coll B  
1007 W Illinois Ave  
Midland, TX 79701

Enhanced Recovery Corp  
Attention: Client Services  
8014 Bayberry Rd  
Jacksonville, FL 32256

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World Finance Corp  
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Abilene, TX 79603

ER Solutions/Convergent Outsour  
PO Box 9004  
Renton, WA 98057

Noble Fin  
PO Box  
Boerne, TX 78006

World Finance Corp  
World Acceptance Corp/Attn Bank  
PO Box 6429  
Greenville, SC 29606

Family Practice Associates  
35 Windmill Circle  
Abilene, TX 79606

Radiology Associates of Abilene  
PO Box 2898  
Abilene, TX 79604

First Financial Bk Na  
400 Pine St  
Abilene, TX 79601

Rafela Camacho  
1566 Oak St.  
Abilene, TX 79602

Hendrick Medical Center  
Collection Department  
1900 Pine Street  
Abilene, Texas 79601

Service Bureau Inc  
2705 81st St  
Lubbock, TX 79423

Internal Revenue Service  
PO Box 21126  
Philadelphia, PA 19114

Taylor Co. Central Appraisal Di  
1534 South Treadaway Blvd  
Abilene, TX 79601